

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

JAMES GHASAR et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 1:19-cv-1224 (CMH/IDD)

CONSENT MOTION TO EXTEND TIME FOR EXPERT REPORTS

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Rule 16(B) of the Local Rules for the United States District Court for the Eastern District of Virginia, and for the reasons set forth in the accompanying memorandum of law, Plaintiffs, by undersigned counsel, respectfully request that this Court extend by four weeks the respective deadlines for the parties to disclose experts and provide reports called for in Fed. R. Civ. P. 26(a)(2)(B). Counsel for the United States consents to Plaintiffs' request. Pursuant to Local Civil Rule 7, Plaintiffs waive a hearing on this motion.

Dated: February 24, 2020

Respectfully submitted,

/s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)

Roy L. Austin, Jr. (*pro hac vice*)

HARRIS, WILTSHIRE & GRANNIS LLP

1919 M Street NW, 8th Floor

Washington, D.C. 20036

Telephone: 202-730-1300

tconnolly@hwglaw.com

raustin@hwglaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed the foregoing via the CM/ECF system, which will send a Notification of Electronic Filing to the following:

Dennis C. Barghaan, Jr.
Kimere J. Kimball
Attorneys for the United States
dennis.barghaan@usdoj.gov
kimere.kimball@usdoj.gov

Dated: February 24, 2020

/s/ Thomas G. Connolly
Thomas G. Connolly (VA Bar No. 29164)
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street NW, 8th Floor
Washington, D.C. 20036
Telephone: 202-730-1300
tconnolly@hwglaw.com

Counsel for Plaintiffs